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WowWee USA, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WOWWEE GROUP LIMITED, WOWWEE
CANADA, INC., and WOWWEE USA, INC.,
Plaintiffs

v.

AAIWA ELECTRONIC TECHNOLOGY CO., LTD., ABCDEFGH STORE, ACESPOWER, ALLWESOME STORE, ANTHNOY'S INTERNATIONAL TRADE, A.K.A. ANTONY INTERNATIONAL TRADE, BABY LOVINY STORE, BAY KITCHENWARES STORE, BEIJING FULIO TECH AND TRADING CO., LTD. A/K/A FULIO, BOOKFONG DOUDOU STORE, BUSTRIEND STORE, HCY SCIENCE AND TECHNOLOGY LTD. A/K/A HCY BONG HIGH CLUB, CIXI CITY MAYEE ELECTRIC APPLIANCE CO., LTD., DAVIDHE STORE, DONGGUAN EREALER ELECTRONIC TECHNOLOGY CO., LTD. A/K/A EREALER INDUSTRIAL (HONGKONG) CO., LIMITED, DONGGUAN INGLEBY MECHANICAL EQUIPMENT CO., LTD , DONGGUAN MUSHANG

CIVIL ACTION No. _____

**MOTION TO EXCEED PAGE LIMIT
OF PLAINTIFF'S MEMORANDUM
OF LAW IN SUPPORT OF
PLAINTIFFS' EX PARTE
APPLICATION FOR: 1) A
TEMPORARY RESTRAINING
ORDER; 2) AN ORDER TO SHOW
CAUSE WHY A PRELIMINARY
INJUNCTION SHOULD NOT ISSUE;
3) ASSET RESTRAINING ORDER;
ORDER AUTHORIZING
ALTERNATIVE SERVICE BY
ELECTRONIC MEANS; 4) AND
ORDER AUTHORIZING
EXPEDITED DISCOVERY**

FILED UNDER SEAL

SILICONE&PLASTIC PRODUCTS CO., LTD.,
DONGGUAN SEORY DECO CO., LTD. ,
DONGGUAN YUYANG MUSICAL
INSTRUMENT CO., LTD. A/K/A MAGNA
UKELELE GUITAR, E_SHOP2008 A/K/A
SHEN ZHEN, EBUY360 OUTLET STORE,
ECIGMOD, EDC HAND SPIN STORE,
EIFFELBRIDE, FIDGET SPINNERS STORE,
FINGER_MONKEY_DHGATE, FUZHOU
JOINTOP IMP. & EXP. CO., LTD. A/K/A
JOINTOP, GUANGZHOU HANG SHENG
TECHNOLOGY CO., LTD. , GUNTOY
STORE, HEFEI SUNHOPE TRADE CO.,
LIMITED, HONG JING BUSINESS, HT
BOUTIQUE TOY STORE, JINJIANG
HUIHAO HARDWARE CO., LTD. A/K/A
JINJIANG HUIHAO HARDWARE PLASTIC
HANDICRAFT CO., LTD., JOA STORE,
KID&LOVE STORE A/K/A KIDS & LOVE ,
KUAILEMENG'S TOY WORLD STORE,
KYSHADOW A/K/A CRYSTAL
KYSHADOW, LEADINGSTAR RC TOY
STORE, LM TOY STORE,
MAGIC_PARADISE, MY TOY WORLD,
NANJING BABYTOP INTERNATIONAL
TRADING CO., LTD., NINGBO TOPTEN
INDUSTRY CO., LTD., ONLINE STORE
236134, OUTDOORCLUBS, PETREL GOO,
PLEASURE SHOPPING BLOCKS TOY
STORE, QINGDAO CLUNT BEARING CO.,
LTD., SAMANTHALEE STORE, SESAME
TOY STORE, SHAANXI KEYSUN BIO-TECH
CO., LTD. A/K/A KAI CHENG INDUSTRIAL
CO., LIMITED, SHANGHAI RONDY TOYS
CO., LTD., SHANGHAI2010, SHANTOU
CHENGHAI GUANGYI MEIJIN PLASTIC
TOYS FACTORY, SHENZHEN AIDAR
TRADING CO., LTD., SHENZHEN
ANTHOME TECHNOLOGY CO., LTD.,
SHENZHEN ARES TECHNOLOGY LIMITED,
SHENZHEN ASPERO TECHNOLOGY CO.,
LTD., SHENZHEN ATOY TECHNOLOGY
CO., LTD., SHENZHEN BAIYI
TECHNOLOGY CO., LTD., SHENZHEN
BAOLIFENG OPTO-ELEC CO., LTD.,
SHENZHEN BETTER NEW GIFT DESIGN

DEPT. A/K/A SZ BETTER LIMITED,
SHENZHEN BO XIN RONG TECHNOLOGY
CO., LTD., SHENZHEN BOLT INNOVATION
TECHNOLOGY CO., LTD., SHENZHEN
CHUNBELL ELECTRONIC CO., LTD.,
SHENZHEN CITY SYART TRADE
COMPANY LTD., SHENZHEN CO-
FRIENDSHIP TRADING CO., LTD.,
SHENZHEN DST TECH CO., LTD.,
SHENZHEN EASYSMOKS TECHNOLOGY
CO., LTD., SHENZHEN EUNION
TECHNOLOGY CO., LTD., SHENZHEN
FAVORITE TECHNOLOGY CO., LTD.,
SHENZHEN FIRE-WOLF ELECTRONICS
CO., LTD., SHENZHEN FIVE STAR
TRADING CO., LTD., SHENZHEN GARUDA
TECHNOLOGY LIMITED A/K/A GARUDA
GROUP , SHENZHEN GDC TILLWELL
TECHNOLOGY LTD., SHENZHEN GOLD
COST TECHNOLOGY CO., LTD.,
SHENZHEN GOOKY TECHNOLOGY CO.,
LTD., SHENZHEN GOWELL TECHNOLOGY
CO., LTD. (G-WIRELESS), SHENZHEN
HANBETER TECHNOLOGY CO., LTD. ,
SHENZHEN HENGFULONG TECHNOLOGY
CO., LTD., SHENZHEN HI FORTUNE
TECHNOLOGY CO., LTD., SHENZHEN
HIPER SONG ELECTRONIC TECHNOLOGY
CO., LTD., SHENZHEN HLS ELECTRONIC
TECHNOLOGY LIMITED, SHENZHEN
HONGTAIDINGYE ELECTRONICS CO.,
LTD. , SHENZHEN ISM TECHNOLOGY CO.,
LTD., SHENZHEN IWELLGLOBAL
TECHNOLOGY CO., LTD., SHENZHEN
JIEDAKE TECHNOLOGY CO., LTD.,
SHENZHEN JIJIALASI INDUSTRIAL CO.,
LTD., SHENZHEN JINGXIN
SCIENCE&TECHNOLOGY DEVELOPMENT
CO., LTD., SHENZHEN JINPIN BALANCE
TECHNOLOGY CO., LTD, SHENZHEN
JOYSTAR ELECTRONICS CO., LTD.,
SHENZHEN JUTUO SUPPLY CHAIN CO.,
LTD., SHENZHEN JXK TECHNOLOGY CO.,
LTD, SHENZHEN KAREN M ELECTRONICS
CO., LTD., SHENZHEN KARISIN
IMPORT&EXPORT CO., LTD., SHENZHEN

KINGSWAY TECHNOLOGY CO., LTD. ,
SHENZHEN KISN TECHNOLOGY CO.,
LIMITED., SHENZHEN LANYOS
INTELLIGENT TECHNOLOGY CO.,LTD,
SHENZHEN LCOSE ELECTRONIC
TECHNOLOGY CO., LTD., SHENZHEN
LEADINGPLUS ELECTRONIC CO., LTD.,
SHENZHEN LEYI INDUSTRIAL CO., LTD.,
SHENZHEN LIPENGDA CULTURAL GIFT
CO., LTD., SHENZHEN LISTING
TECHNOLOGY CO., LTD., SHENZHEN
LONG SHENG CENTURY TECHNOLOGY
CO., LTD., SHENZHEN MYTASTE RJX
HARDWARE CO., LTD, SHENZHEN
NAVATA TECHNOLOGY CO., LTD.,
SHENZHEN NEW IMAGE TECHNOLOGY
CO., LTD , SHENZHEN OREBO
TECHNOLOGIES LTD., SHENZHEN
ORHONG ELECTRONIC TECHNOLOGY
CO., LTD., SHENZHEN QIO TECHNOLOGY
CO., LTD., SHENZHEN QUEST
TECHNOLOGY CO., LTD., SHENZHEN
SHENYUAN TECH CO., LTD., SHENZHEN
SKYVIEW TECHNOLOGY LIMITED,
SHENZHEN SMOFIT TECHNOLOGY CO.,
LTD., SHENZHEN SPDAK TECHNOLOGY
COMPANY LIMITED, SHENZHEN SPRI
TECHNOLOGY CO., LTD., SHENZHEN
SUNFIRE TECHNOLOGY CO., LTD.,
SHENZHEN TECHNOLI TECHNOLOGY CO.,
LTD., SHENZHEN USMART ELECTRONICS
TECHNOLOGY CO., LTD. , SHENZHEN
VCEEGO TECHNOLOGY CO., LTD.,
SHENZHEN VFOCUS ELECTRONIC
TECHNOLOGY R&D CO., LTD., SHENZHEN
V-VISION TECHNOLOGY CO., LTD.,
SHENZHEN WELLCORE TECHNOLOGY
CO., LTD., SHENZHEN WOW GIFT CO.,
LTD., SHENZHEN XINGAOSHENG
TECHNOLOGY CO., LTD., SHENZHEN
XINHAOYUAN TECHNOLOGY CO., LTD.
SHENZHEN XZD TECHNOLOGY CO., LTD.,
SHENZHEN YUWAY TECHNOLOGY CO.,
LTD. , SHENZHEN Z-COOL TIMES
TECHNOLOGY CO., LTD., SHENZHEN
ZMART TECHNOLOGY CO., LTD.,

SHENZHEN ZOOMING ELECTRONIC CO., LTD., AIPIN STORE, SHOP2949193 STORE, SHOP319037 STORE, STEPHAN STORE STORE, HONG KONG SUPERFAST TECHNOLOGY CO. LTD. A/K/A SUPERFAST, SUPERGLOBAL, SUZHOU LN PROMO CO., LTD., SUZHOU SWEETDRESSES WEDDINGDRESS CO. LTD. A/K/A SWEETDRESSES, SHENZHEN CITY POLY HUI FOREIGN TRADE CO., LTD. A/K/A SZ_ST_LUO, SZALONE1, TEEM TECHNOLOGY CO., LTD. A/K/A SQUISHIES THEA STORE, TUKIIE STORE, TUMI OFFICIAL STORE, TUMIPETLIFE STORE, XIAMEN JIAYIKANG ENVIRONMENTAL TECHNOLOGY CO., LTD., XIAMEN WINDSAIL, OUTDOOR GEAR & SPORTING GOODS CO., LTD., SHENZHEN BITIAN TECHNOLOGY LTD., XQBOSS STORE, YIWU BRIOSTA APPARELS FACTORY, YIWU CONA SPORTS CO., LTD., YIWU ECO BAOYU E-BUSINESS FIRM, YIWU GREEN SHINE ARTS & CRAFTS CO., LTD. , YIWU GREEN SHINE GIFTS AND TOYS CO., LTD., YIWU HUI ZHE TRADING CO., LTD., YIWU KUOTAI TRADING CO., LTD., YIWU RUIMIAN E-COMMERCE TRADING FIRM, AND ZHIMEI ONLINE A/K/A ZHIYUANWEDDING,

Defendants

Plaintiff WowWee Group Limited, Plaintiff WowWee Canada, Inc., and Plaintiff WowWee USA, Inc. (collectively, “WowWee” or “Plaintiffs”), hereby move for an order granting WowWee permission to file a memorandum of law in excess of the page limitations set by the Court in support of WowWee’s *ex parte* application for the following: 1) a temporary restraining order; 2) an order to show cause why a preliminary injunction should not issue; 3) an asset restraining order; 4) an order authorizing alternative service by electronic mail; and 5) an order authorizing expedited discovery against above-referenced Defendants (and more completely identified in Paragraphs 8 through 162 of the Complaint) in light of Defendants’

intentional and willful offerings for sale and/or sales of counterfeit and infringing products (“Application”), which is being filed herewith.

In this District Court, each Judge is allowed to set his or her own rules regarding the page limitations for filing a memorandum of law. Seeing as WowWee is filing its memorandum of law in support of its Application contemporaneously with its initial pleadings, this case has not yet been opened or assigned a Judge. Accordingly, WowWee is unable to ascertain whether its memorandum of law will exceed any page length restriction established by the designated Judge.

As such, WowWee seeks permission to file a memorandum of law in support of its Application that is sixty (60) pages long. WowWee believes that this length is necessary to adequately support its *ex parte* Application for the following: 1) a temporary restraining order; 2) an order to show cause why a preliminary injunction should not issue; 3) an asset restraining order; 4) an order authorizing alternative service by electronic mail; and 5) an order authorizing expedited discovery against Defendants.

Accordingly, WowWee respectfully requests that the Court grant this motion allowing WowWee to submit a memorandum of law in support of its Application which may exceed the page limit instructed by the Court.

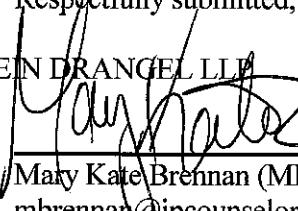
A Proposer Order granting this motion is submitted herewith.

Dated: October 16, 2017

Respectfully submitted,

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